

REMARKS

Reconsideration of the above-identified application is respectfully requested in view of the following remarks.

Claim 16 is newly added by this amendment. Thus, Claims 1-16 are currently pending in this application, with Claims 1-14 and 16 being currently at issue. Claims 1, 9, 13, 14, 15 and 16 are independent claims.

Examiner Bayat is thanked for indicating that Claim 15 is allowed because the references fail to teach certain distinguishing features. These distinguishing features are defined in Claim 15, in combination with the other claimed features, by way of means-plus-function terms. New Claim 16 generally defines these distinguishing features by way of apparatus terms. Therefore, new Claim 16 should be allowable at least for the same reasons at Claim 15.

The Official Action rejects Claims 1-14 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,437,792, hereinafter *Ito*, in view of U.S. Patent No. 5,909,505, hereinafter *Katayama*.

An object of the presently claimed invention is to solve the problems associated with conventional entropy coding and a decrease in compression ratio due to deterioration of continuity in color data, which derives from deviation in the values of the data. See Description of Related Art section of the present application.

An aspect of the presently claimed invention that addresses these issues is generally directed to image data coding having, among other features, data conversion for converting color data that is contained in image data, into converted color data that corresponds to a difference from a reference color, and entropy

coding of the converted image data in which the color data has been converted.

These features are presently generally defined in Claims 1, 9, 13 and 14.

The presently claimed invention does not simply involve entropy coding of color image data. It involves entropy coding of color image data that has been converted into color image data that corresponds to a difference from a reference color.

Neither *Ito* nor *Katayama* teach or suggest this above-noted combination of features, or even address the issues identified above and described in the Descriptions of Related Art section of the present application.

Rather, *Ito* discloses an image processing apparatus for reducing image data when the color gamut of an output device is different than that of an input device. *Ito* reduces the color gamut of the input color signal to match the color gamut of the output color device, to provide a color near that in the input device. See column 1, lines 14-29.

The Official Action proposes that the latter part of the elements of the data converting unit of the presently claimed invention is taught in column 22, lines 29-50 of *Ito*. However, this portion of *Ito* is related to a colorimetric area, and discloses that the parameter K is used when setting this area and is determined with the printer and monitor color gamuts as a reference. Thus, as specifically noted in column 22, lines 23-25, the colorimetric area is not subjected to color reduction. Further, if the input signal is in the colorimetric area, it is outputted as it is, and if the input signal is outside the colorimetric area, a reduced signal is output. See column 21, line 56 through column 22, line 19. In other words, *Ito* fails to disclose the data converting unit of the presently claimed invention for converting color data that is contained in

image data, into converted color data that corresponds to a difference from a reference color.

Further, *Katayama* also fails to disclose the earlier noted combination of features, and only discloses that entropy coding is performed, which is no more than a technique described in the Background of the Invention section of the present application. Therefore, *Katayama* fails to disclose the element of a data converting unit, and does not even disclose the color image data that has been converted in the data converting unit being subject to entropy encoding.

Applicant further submits that the Official Action fails to identify adequate motivation for making the combination proposed therein.

For at least these reasons, Claims 1, 9, 13 and 14 should be allowable.

Claims 2-8 and 10-12 depend from Claims 1 and 9, respectively, and should be allowable for at least the same reasons.

Should any questions arise in connection with this application, or should the Examiner feel that a teleconference with the undersigned would be helpful in resolving any remaining issues pertaining to this application, the undersigned respectfully requests that he be contacted at the number indicated below.

Respectfully submitted,

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